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August 6, 2024

BY ECF

The Honorable Richard M. Berman United States District Judge Southern District of New York Daniel P. Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

> Re: United States v. Pham, 12 Cr. 423 (RMB)

Dear Judge Berman:

This letter is respectfully submitted on behalf of defendant Minh Quang Pham, whom Bobbi C. Sternheim, Esq., and I represent in the above-entitled matter, and respectfully requests an adjournment of Mr. Pham's sentencing from next Wednesday, August 13, 2024, until late November 2024. I have been in contact with Assistant United States Attorney Jacob H. Gutwillig, and he has informed me the government does not object to the adjournment, and takes no position with respect to the length of the adjournment.

The reason for the length of the requested adjournment is, in part, due to an anticipated three-to-four week trial in which I am defense counsel that is scheduled to begin October 21, 2024 [*United States v. Zeitlin*, 23 Cr. 419 (LAK)].

Also, for scheduling purposes, defense counsel are not available December 3, 2024, through December 13, 2024, and from December 18, 2024, through December 20, 2024. The government prefers the sentencing not be scheduled during the week of Thanksgiving, which begins Monday, November 25, 2024.

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Accordingly, it is respectfully requested that Mr. Pham's sentencing be adjourned until late November 2024. As noted above, the government does not object to the application for an adjournment, and takes no position with respect to the length of the adjournment.

Respectfully submitted,

Joshua L. Dratel

Bobbi C. Sternbeim

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